

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WISCONSIN

TYLER HOLTE,

Plaintiff,

CASE NO. 20-CV-131

v.

CITY OF EAU CLAIRE,
and HUNTER BRAATZ
(in his individual capacity),

Defendants.

DEFENDANTS' PROPOSED SPECIAL VERDICT

The Defendants, City of Eau Claire and Hunter Braatz, by and through their attorneys, Municipal Law & Litigation Group, S.C., pursuant to the court's procedures governing final pretrial submissions and conference, propose the attached special verdict forms for both phases of trial.

Dated this 16th day of July, 2021.

MUNICIPAL LAW & LITIGATION GROUP, S.C.

Attorneys for City of Eau Claire and Hunter Braatz.

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DEFENDANTS' PROPOSED SPECIAL VERDICT (Liability Phase)

We, the jury, find as follows:

Question No. 1: Did Hunter Braatz use unreasonable force under the circumstances against Tyler Holte on April 1, 2015?

Answer: _____ (Yes or No)

Dated this _____ day of August, 2021.

Presiding Juror

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DEFENDANTS' PROPOSED SPECIAL VERDICT (damages phase)

We, the jury, find as follows:

Question No. 1: What sum of money, if any, will fairly and reasonably compensate Tyler Holte for damages because of Hunter Braatz's use of force?

\$ _____

Answer: _____ (Yes or No)

Dated this _____ day of August, 2021.

Presiding Juror